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RECEIVED

MAY 18 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

USWEST

May 18, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE: CC Docket No. 99-35, Transmittal Nos. 965 and 975 –  
Erratum to Rebuttal

Dear Ms. Roman Salas:

U S WEST Communications, Inc. filed its Rebuttal on May 17, 1999 in the above-referenced proceeding. Subsequently, it came to the attention of U S WEST that a reference to an attachment on page 19 of the Rebuttal was incomplete.

The relevant sentence on page 19 (lines five through seven) appears as follows:

“Attachment \_\_ also demonstrates that U S WEST’s claim that it used a 2% maintenance factor for LNP-related investment, in fact, is correct.”

This sentence should have read as follows:

“Attachment 1 also demonstrates that U S WEST’s claim that it used a 2% maintenance factor for LNP-related investment, in fact, is correct.”

Enclosed with this letter is a corrected copy of page 19, which U S WEST requests be substituted for the page 19 currently contained in the Rebuttal. U S WEST includes with this letter six copies of page 19, to accommodate the number of copies of the Rebuttal that were filed yesterday. U S WEST is also serving a copy of the corrected page 19 on all of the parties that were served yesterday with its Rebuttal.

No. of Copies rec'd 076  
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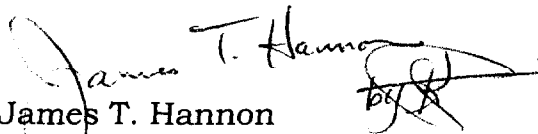
Ms. Magalie Roman Salas

May 18, 1999

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Thank you for your assistance with this matter and U S WEST apologizes to the Commission and parties to this proceeding for any inconvenience this situation may have caused.

Respectfully,

  
James T. Hannon

Enclosures

cc: Parties Listed on Attached Service Certificate

failures. Attachment 1 disaggregates network operating expense (*i.e.*, the amounts contained in Chart 3 in the line labeled “Maintenance-network”) into its component parts including the three accounts that make-up network maintenance.

This should clear up any misunderstanding that exists due to U S WEST’s lack of consistency in the use of the term “network maintenance.” Attachment 1 also demonstrates that U S WEST’s claim that it used a 2% maintenance factor for LNP-related investment, in fact, is correct.

C. U S WEST’s Fifth SCP Pair

At the risk of being redundant, U S WEST will briefly respond to AT&T’s claim that U S WEST should not be allowed to include the costs of a fifth SCP in its LNP rates.<sup>32</sup> AT&T contends that, while the expenses associated with U S WEST’s fifth SCP pair would not have been incurred “but for” LNP, these expenses were not incurred “for the provision of” LNP.<sup>33</sup> There is no factual basis for AT&T’s claim.

“U S WEST purchased a fifth SCP pair solely to act as a Message Relay Point (“MRP”) for LNP purposes.”<sup>34</sup> MRP functionality is required by the Illinois Commerce Commission LNP standards,<sup>35</sup> which serve as the basis of the LRN architecture for providing long-term LNP. The MRP (*i.e.*, the fifth SCP pair) was specifically created to ensure that queries are routed properly in an LNP environment. Without MRP functionality, queries from ported numbers would be

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<sup>31</sup> Id.

<sup>32</sup> Id. at 13-15.

<sup>33</sup> Id.

<sup>34</sup> Direct Case at 7.

## CERTIFICATE OF SERVICE

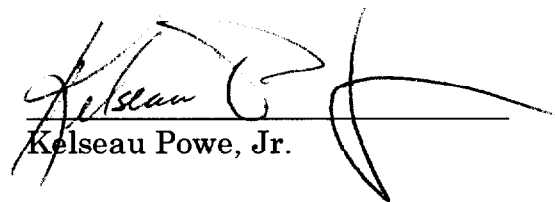
I, Kelseau Powe, Jr., do hereby certify that on this 18<sup>th</sup> day of May, 1999, I have caused the foregoing **LETTER (ERRATUM TO REBUTTAL)** to be served via hand delivery on the Competitive Pricing Division (two hard copies, and diskette), at the following address:

Competitive Pricing Division  
Federal Communications  
Commission  
5<sup>th</sup> Floor  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

and on the Federal Communications Commission's commercial copying firm,  
International Transcription Services, Inc. (one hard copy), at the following address:

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and via first class U.S. Mail, postage prepaid, upon the persons listed on the attached service list (one hard copy each).

  
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